

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

FILED

In re: LISA S. BLYTHE,

2006 MAR 23 P 3:33

Debtor.

US BANKRUPTCY COURT
EASTERN DISTRICT OF WI

ROBERT MULLINS,

Case No. 04-26018-SVK

Plaintiff,

Chapter 7

v.

Adv. Proc. No. 04-2274

LISA S. BLYTHE,

Defendant.

EX PARTE MOTION TO REOPEN AND FOR DEFAULT JUDGMENT

The Plaintiff, Robert Mullins, ("Mullins") hereby moves the Court, The Honorable Susan V. Kelley presiding, instant, to reopen the above-captioned Adversary Proceeding and to enter Judgment in Mullins favor and against Defendant, Lisa S. Blythe, ("Blythe") in the amount of \$164,444.00 pursuant to the Stipulation for Dismissal Subject to Terms executed by and between the parties on April 1, 2005. This Motion is supported by the Affidavit of Steven W. Jelenchick which is attached hereto and incorporated herein by reference.

Respectfully submitted this 23rd day of March, 2006.

BECK, CHAET & BAMBERGER, S.C.
Attorneys for Plaintiff, Robert Mullins

By: Steven W. Jelenchick
Steven W. Jelenchick
State Bar No. 1037766

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March 23, 2006

VIA HAND DELIVERY

Hon. Susan V. Kelley
United States Bankruptcy Court
Eastern District of Wisconsin
517 E. Wisconsin Avenue
Milwaukee, WI 53202-4581

Re: *Paul A. Karsten, Debtor*
Bankruptcy No. 04-26017-SVK
Robert Mullins v. Paul A. Karsten
Adv. Proc. No. 04-2275
Lisa S. Blythe, Debtor
Bankruptcy No. 04-26018-SVK
Robert Mullins v. Lisa S. Blythe
Adv. Proc. No. 04-2274

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U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF WI

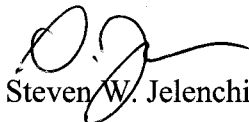
Dear Judge Kelley:

Enclosed please find the original and three (3) copies of the Ex Parte Motion to Reopen and for Default Judgment, Affidavit of Steven W. Jelenchick in Support of Ex Parte Motion to Reopen and for Default Judgment, Order for Default Judgment and Judgment with reference to the above matters.

If the above-mentioned documents meet with the Court's approval, please sign the Order for Default Judgment and ask your clerk to docket the Judgment and return the file-stamped copies to me in the self-addressed, stamped envelope provided.

Thank you for your consideration.

Very truly yours,


Steven W. Jelenchick

SWJ:pjm

Enclosures

cc: Robert Mullins (w/encl.)

File No. 04118